

**EXHIBIT A****I. Disputed Terms**

<b>Term to be Construed</b>	<b>Sentius' Proposed Construction</b>	<b>Sentius' Supporting Evidence</b>	<b>MS's Proposed Construction</b>	<b>MS's Supporting Evidence</b>
<b>Database</b> (‘731/’633)	a collection of data with a given structure for accepting, storing and providing, on demand, data for at least one user	<p>Specification: ‘731 Fig. 1; 4:16-30; 4:64-5:4; 5:5-19; 5:20-28; 5:45-50; 5:54-56; 5:62-6:2; 7:11-20; 9:51-54; Claims 1, 8, 50-53, 89-92, 95, 96, and Abstract. ‘633 Claims 17, 49-52, 62, 88-91, 101, 133-136, 146, 172-175.</p> <p><b>IBM Dictionary of Computing (1994)</b>, p. 165 (“database: (1) A collection of data with a given structure for accepting, storing, and providing, on demand, data for multiple users. (T) (2) A collection of interrelated data organized according to a database schema to serve one or more applications. (T) (3) A collection of data fundamental to a system. (A) (4) A collection of data fundamental to an enterprise (A)”)</p>	<p>A collection of data organized and searchable via records and fields. A record is one complete entry in a database, e.g., Gerry Friesen, 12 West 21 Street, New York, NY 10010, 212-691-8215. A field would be the street address field, namely 12 West 21 Street.</p>	<p>’731 Patent: Figure 1, Figure 2, 4:15-30, 4:61-6:2, 9:49-60</p> <p>’633 Patent: Figure 1, Figure 2, 4:23-37, 5:1-6:6, 9:49-60</p> <p>File history for U.S. Pat. No. 5,822,720, 2-16-1994 Office Action Response</p> <p>’985 Patent: Figure 1, Figure 2, Figure 7, Figure 9B, Figure 12, 1:14-19, 1:43-53, 2:7-56, 2:60-67, 3:27-4:50, 6:50-7:4, 7:35-44, 9:18-10:13, 11:56-67, 13:33-14:6</p> <p>’349 Patent: Figure 1, Figure 2, Figure 7, Figure 9B, Figure 12, 1:15-25, 1:47-57, 2:10-67, 3:1-4:52, 7:19-44, 9:1-10:7, 11:56-67; 12:36-49; 13:33-14:6</p> <p>Newton’s Telecom Dictionary (1994)</p>

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		<p><b>Microsoft Press Computer Dictionary. The Comprehensive Standard For Business, School, Library, and Home (1994)</b>, page 105 (“database: Loosely, any aggregation of data; a file consisting of a number of records (or tables), each of which is constructed of fields (columns) of a particular type, together with a collection of operations that facilitate searching, sorting, recombination and similar activities”)</p> <p><b>Webster's II New Riverside University Dictionary (1984)</b>, p. 348 (“database: A collection of data arranged for ease and speed of retrieval, as by a computer.”)</p> <p><b>Barron's Dictionary of Computer and Internet Terms, Eighth Edition (2003)</b>, pg. 123 (“database:</p>		<p>Microsoft Press Computer User's Dictionary (1998)</p> <p>Sentius' opening claim construction brief from the Flyswat litigation, pp.3 &amp; 9</p> <p>Sentius' final claim construction brief from the Flyswat litigation, p.1</p> <p>Flyswat claim construction order, p.10.</p> <p>SENTIUS0000686-88, 902.</p>
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		<p>A collection of data stored on a data storage medium, such as a disk, that can be used for more than one purpose.”)</p> <p><b>The Computer Glossary. The Complete Illustrated Dictionary Ninth Edition. p. 86 (2001)</b> (“database: (1) A set of interrelated files that is created and managed by a DBMS. (2) Any electronically-stored collection of data.”)</p> <p><b>IEEE STD-100 (1992)</b>, p. 304 (“a collection of logically related data stored in one or more computerized files.”)</p> <p><b>1981, Douglas E. Comer, Purdue University Computer Science Department</b> (A flat file is the simplest possible database. It consists of a single, unformatted text file in which each line corresponds to a record. k-1 occurrences of a separator character divide each</p>		
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		<p>record into k variable length fields);</p> <p><b>Managing Memory Mapped Files, Randy Kath, Microsoft Developer Network Technology Group (1993)</b>  ("Say, for example, an application implements a flat-file database file structure, where the database consists of hundreds of sequential records.")</p> <p><b>The Computer Glossary. The Complete Illustrated Dictionary Ninth Edition. p. 86 (2001) THE DATABASE</b> (a text document can be a database, as illustrated).</p>		
<b>Database</b> (‘985/’349)	Same as above.	<p>Same as above.</p> <p>Additionally:  Figures 2, 12; ‘985 patent at Abstract; 23:37-48; 4:13-26; 6:10-15; 9:1-12,19-29; 9:60-10:3; 11:14-17, 56-67; 12:37-45; 12:66-13:4; 13:33-67;  Claims 1, 6, 11, 16, 38;</p>	Same as above.	Same as above.

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		'349 Claims 1, 6, 15, 20, 25, 31, 41		
a <b>link</b> to the at least one of the plurality of external reference materials/ <b>links</b> to the external reference materials  ( '731/'633)	electronic connection to one or more external reference materials/ electronic connections to the external reference materials	<p>Specification:</p> <p>'731 at Fig. 1, Fig. 2, 4:35-38; 5:5-27; 6:23-67; 7:20-50; Claims 8, 49, 96; '633 Claims 62, 146</p> <p>File History:</p> <p><b>A Method of Specifying Links in Hypermedia, WO 95/04974</b>, pps. 1-4. (cited in prosecution)</p> <p><b>The IBM Dictionary of Computing (1994)</b> p. 386 (Definition 4 of "Link" is "In hypertext, an author-defined association between two information nodes. See hypertext link"; "Hypertext link" is defined as "A connection between one piece of information and another." )</p> <p><b>Viewing Dexter with Open Eyes</b>, John J. Leggett and John L. Schnase (1994)</p>	a pointer to data or information or the location of data or information in a record that is different than the originating record  / pointers to data or information or the location of data or information in a record that is different than the originating record	<p>'731 Patent: Abstract, Figure 1, Figure 2, 4:15-37, 4:61-6:2, 6:37-65; 9:49-60</p> <p>'633 Patent: Abstract, Figure 1, Figure 2, 4:23-45, 5:1-6:6, 6:39-67; 9:49-60</p> <p>'985 Patent: 4:60-5:3, 10:28-41, 12:1-5, 13:5-13</p> <p>'349 Patent: Abstract, 2:10-23, 2:46-58, 4:62-5:5, 8:36-50, 10:28-41, 12:1-5, 13:5-13</p> <p>IEEE Standard Dictionary of Electrical and Electronics Terms (1996)</p> <p>Sentius opening claim construction brief from the Flyswat litigation, pp.3, 6-7, 14</p> <p>Sentius final claim construction brief from the Flyswat litigation, pp.3-8</p> <p>Flyswat claim construction order, pp.10-18</p>

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		<p>Commun. ACM 37, 2 (1994), 76-86. See especially pp. 78 and 82.</p> <p><b>Light Hypermedia Link Services: A Study of Third Party Application Integration.</b> Hugh C. Davis, Simon Knight, and Wendy Hall. (1994). Proceedings of the 1994 ACM European Conference on Hypermedia Technology (ECHT '94). ACM, New York, NY, USA, 41-50.</p> <p><b>U.S. Patent No., 5,781,900</b> (referenced by '633) ("After the pre-assigned key is pressed, computer system 700 accesses a database 714 already loaded in the system memory of computer system 700. Database 714 contains a plurality of lines. Each line can be considered a record, which contains the name of a musical instrument, an equal sign, and the name of a program module (e.g., a file having an "EXE" extension). The</p>		<p>SENTIUS0000896-97, SENTIUS0000902-903, SENTIUS0001181, SENTIUS0001295-96</p>
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		<p>equal sign is an association symbol. The operation performed by the program module corresponds to the operation performed by computer system 700. It should be appreciated that any symbol (e.g., the "*" symbol) could be used as an association symbol. The programs associated with the operations could have any format executable by computer system 700 (e.g., files having "WAV", "BMP" and other extensions).</p> <p>In this embodiment, computer system 700 compares the word in buffer 712 with the words in database 714 to the left of the equal sign. A match is found, and the program corresponds to the word "piano" is "piano.exe". Computer system 700 then invokes the program "piano.exe". This program causes computer system 700 to play a piece of piano music. As a result, a piece of piano music is played by</p>		
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		<p>loudspeaker 718.")</p> <p><b>IBM Dictionary of Computing (1994)</b>, p. 386</p> <p>link (1) In computer programming, the part of a program, in some cases a single instruction or an address, that passes control and parameters between separate portions of the computer program. (I) (AI Synonymous with linkage. (2) The combination of the link connection (the transmission medium) and two link stations. one at each end of the link connection. A link connection can be shared among multiple links in a multipoint or token-ring configuration. (3) In an IMS/VS multisystem environment, the connection between two systems. (4) In hypertext, an author defined association between two information nodes. See hypertext link. (5) In the AIX file system, a connection between an i-</p>		
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		<p>node and one or more file names associated with it. (6) In TCP/IP, a communications line. A TCP/IP link may share the use of a communications line with SNA. (7) In an ESCON environment, the physical connection and transmission medium used between an optical transmitter and an optical receiver. A link consists of two conductors.</p> <p>The court rules that <b>linking</b> means: "creating a tagless, media independent electronic connection using a computer look up table."</p> <p>Flyswat Claim Construction Order at 18. <b>Tagless</b></p>		
<b>Syndicating / syndicated</b> ( '985 Claims 1,11)	making content available for automatic download over the internet to one or more remote subscribed computers	<p>Specification:</p> <p>'985 at: Title; Abstract; Figs. 1, 7, 9B, 1: 15-19; 2:14-17; 2:44-56; 2:63-65; 3:12-14; 8:31-34; 12: 37-45; Claims 1,11</p>	Distributing/ Distributed	<p>'985 Patent: 1:14-20, 2:5-20</p> <p>'985 FH: 12-28-2009 Notice of Allowability</p> <p>'349 Patent: Abstract, 1:15-</p>

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		<p><b>Webster's II New Riverside University Dictionary</b> (1984)  syndicate: "n... 2. an agency that sells articles for publication in a number of newspapers or periodicals simultaneously... v. ... 2. To sell (e.g., an article) through a syndicate for publication."</p> <p>Lewin, James. "<b>An Introduction To RSS News Feeds: Using Open Formats For Content Syndication.</b>" (2000).</p> <p>Downes, Stephen. "<b>Content Syndication And Online Learning.</b>" Education at a Distance 14.11 (2000).</p> <p>Carr, Nicholas G., ed. <b>The Digital Enterprise: How To Reshape Your Business For A Connected World.</b> Harvard Business Press, (2001), pps 21-24.</p>		<p>25, 2:10-23</p> <p>The Oxford Essential Dictionary (1998).</p>
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		Souzis, A., et al. <b>ICE implementation cookbook: Getting Started With Web Syndication</b> . Retrieved 17/7/2001, from www.idealalliance.org, Nov. 2000 p. 3:		
<b>Receiving / received</b> (‘349 patent)	obtaining and storing automatically	<p>Specification:</p> <p>‘349 at: Title; Abstract; Figs. 1, 7, 9B, 1:19-23; 2:17-19; 2:46-58; 2:65-67; 3:14-16; 8:31-34; 12:42-45; 14: 9-10; 14:62-63; 15:64-65; Claims 1, 15, 31.</p> <p><b>IBM Dictionary of Computing (1994)</b>, p. 559 (<b>receive</b> (1) To obtain and store data. (2) In systems with ACF/TCAM, to obtain a message transmitted from a terminal to the computer over a line. Contrast with send. See also accept, enter.)</p> <p><b>The IBM Dictionary of Computing (1994)</b> p. 174 (data processing: The systematic performance of</p>	Plain and ordinary meaning, which does not require or exclude “obtaining and storing automatically”	

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		operations upon data; for example, arithmetic or logic operations upon data, merging or sorting of data, assembling or compiling of programs. Synonymous with automatic data processing.)		
<p><b>linking</b> the identified content with the at least one term</p> <p>(‘985 claim 11)</p> <p><b>linking</b> to the supplemental content</p> <p>(‘985 claim 16)</p> <p><b>link</b> the identified content with the at least one term</p> <p>(‘349 claim 1)</p> <p><b>linking</b> to the content</p> <p>(‘349 claim 6)</p> <p><b>linking</b> the identified content with the at least one</p>	create/creating an electronic connection	<p>See above.</p> <p>Also, specification:</p> <p>‘731 at Fig. 1, Fig. 2, 4:35-38; 5:5-27; 6:23-67; 7:20-50;</p> <p>‘985 Claims 1, 6, 11, 16;</p> <p>‘349 Claims 1, 6, 15, 20, 31.</p> <p>File History:</p> <p><b>A Method of Specifying Links in Hypermedia</b>, WO 95/04974, pps. 1-4. (cited in prosecution)</p>	[create/creating] a pointer to data or information or the location of data or information in a record that is different than the originating record	<p>’731 Patent: Abstract, Figure 1, Figure 2, 4:15-37, 4:61-6:2, 6:37-65; 9:49-60</p> <p>’633 Patent: Abstract, Figure 1, Figure 2, 4:23-45, 5:1-6:6, 6:39-67; 9:49-60</p> <p>’985 Patent: 4:60-5:3, 10:28-41, 12:1-5, 13:5-13</p> <p>’349 Patent: Abstract, 2:10-23, 2:46-58, 4:62-5:5, 8:36-50, 10:28-41, 12:1-5, 13:5-13</p> <p>IEEE Standard Dictionary of Electrical and Electronics Terms (1996)</p> <p>Sentius opening claim construction brief from the Flyswat litigation, pp.3, 6-</p>

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<p>term</p> <p>(‘349 claim 15)</p> <p><b>linking</b> the content with the at least one term (‘349 claim 31)</p>				<p>7, 14</p> <p>Sentius final claim construction brief from the Flyswat litigation, pp.3-8</p> <p>Flyswat claim construction order, pp.10-18</p> <p>SENTI US0000896-97, SENTIUS0000902-903, SENTIUS0001181, SENTIUS0001295-96</p>
<p><b>parsing</b> one or more documents to identify at least one term based on at least one rule (‘985 claim 1, ‘349 claim 1)</p> <p><b>parsing</b> one or more source documents to identify at least one term based on one or more predetermined rules (‘349 claim 31)</p>	<p>breaking at least one document into segments to identify at least one term based on at least one rule</p> <p>breaking at least one source document into segments to identify at least one term based on at least one predetermined rule</p>	<p>Specification: Figure 1, 7, 9A and 9B and ‘985 at 2:21-26; 6:51-60; 8:51-58; 9:1-3; 9:37-52; Claims 1, 21; ‘349 Claims 1, 31</p> <p><b>Microsoft Press Computer Dictionary. The Comprehensive Standard For Business, School, Library, and Home (1994)</b>, page 292 (“to break input into smaller chunks so that a program can act upon the information”)</p> <p><b>Dictionary of Computer</b></p>	<p>breaking at least one entire document into sentences, words and/or phrases to identify at least one term based on at least one pre-established criteria</p>	<p>‘985 patent: 2:21-30, 6:50-7:4, 8:21-30</p> <p>‘985 File History: Dec. 1, 2009 Interview Summary;</p> <p>‘349 patent: 2:24-32, 6:50-60, 8:22-30</p> <p>‘349 File History: Feb. 8, 2011 Office Action Response at 12</p> <p>SENTIUS0001105, SENTIUS0000687-89,</p>

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		<b>and Internet Terms</b> (7 <sup>th</sup> ed.) (2000), p. 350 (“The analysis, by computer, of the structure of statements in a human or artificial language.”)		
<b>term module</b> (‘985 claim 11)	<p><b>a computer processor in conjunction with executable code for instructing the computer processor to parse one or more documents to identify at least one term based on at least one rule</b></p> <p>Alternatively (if Court considers term to be MPF),</p> <p>Function: parsing one or more documents to identify at least one term based on at least one rule</p> <p>Structure: a computer processor in conjunction with executable code for instructing the computer processor to parse one or more documents to identify at least one term based on at least one rule, as described in the</p>	<p>Specification: Figures 1, 7, 9A and 9B and ‘985 at 6:57-60; Claim 11.</p> <p><b>IBM Dictionary of Computing (1994)</b>, p. 439 (<b>module</b> (1) In programming languages, a language construct that consists of procedures or data declarations and that can interact with other such constructs; for example, in Ada, a package; in FORTRAN, a program unit; in P1../1, an external procedure. (I) (2) A program unit that is discrete and identifiable with respect to compiling, combining with other units, and loading; for example, the input to or output from an assembler, compiler,</p>	<p>Means Plus Function</p> <p>Function: “breaking at least one entire document into sentences, words and/or phrases to identify at least one term based on at least one pre-established criteria”</p> <p>Corresponding Structure: none</p>	See “parsing,” above.

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	specification and equivalents thereof	linkage editor, or executive routine. (A) (3) A packaged functional hardware unit designed for use with other components. (A) (4) A part of a program that usually performs a particular function or related functions. (5) In FORTRAN, an external program unit that contains or accesses definitions to be accessed by other program units. See standard module. (6) See bound control module, control module, disk storage module, load module, object module, programming module, source module, unbound control module. (7) Synonymous with program unit. (8) See also encapsulated type, run file.		
processing module ('985 claim 11)	<b>a computer processor in conjunction with executable code for instructing the computer processor to identify content for the at least</b>	Specification: Figures 1, 7, 9A and 9B and '985 at 8:36-50; 9:1-12. 4:20-26; Claim 11.	Means Plus Function  Function: "identifying content for the at least one term"	

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	<p><b>one term</b></p> <p>Alternatively (if Court considers term to be MPF),</p> <p>Function: identifying content for the least one term</p> <p>Structure: a computer processor in conjunction with executable code for instructing the computer processor to identify content for the at least one term, as described in the specification and equivalents thereof</p>		Corresponding Structure: none	
<b>processor</b> ('349 claim 15)	<p><b>a computer processor in conjunction with executable code for instructing the computer processor to parse one or more documents to identify at least one term based on at least one rule</b></p> <p>Alternatively (if Court considers term to be MPF),</p> <p>Function: parsing one or more documents to identify</p>	<p>Specification: Figures 1, 7, 9A and 9B and '349 at 6:57-60; Claim 15.</p> <p><b>IBM Dictionary of Computing (1994)</b>, p. 533 (processor (I) In a computer a functional unit that interprets and executes instructions. A processor consists of at least an instruction control unit and an arithmetic and logic unit. (T) (2) One or more</p>	Same as "term module," above	Same as "term module," above



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	<p>at least one term based on at least one rule</p> <p>Structure: a computer processor in conjunction with executable code for instructing the computer processor to parse one or more documents to identify at least one term based on at least one rule, as described in the specification and equivalents thereof</p>	<p>integrated circuits that process coded instructions and perform a task. See also system processor, service processor, input/output processor. (3) Deprecated term for processing program.)</p>		
<b>module</b> ('349 claim 15)	<p><b>a computer processor in conjunction with executable code for instructing the computer processor to identify content for the at least one term</b></p> <p>Alternatively (if Court considers term to be MPF),</p> <p>Function: identifying content for the least one term</p> <p>Structure: a computer processor in conjunction with executable code for</p>	<p>Specification: Figures 1, 7, 9A and 9B and '349 at 8:36-50, 9:1-12; Claim 15.</p>	Same as "processing module," above	Same as "processing module," above

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	instructing the computer processor to identify content for the at least one term, as described in the specification and equivalents thereof			
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